



St George's, University of London Student Protection Plan



Information and document control

Provider's name: St. George's Hospital Medical School, which carries out its activities as St. George's, University of London (herein referred to as "SGUL")

Provider's UKPRN: 10007782

Legal address: Cranmer Terrace, London, SW17 0RE

Contact point for enquiries: Jenny Laws, Academic Registrar

Current students may also wish to seek advice from their Personal Tutor about this Student Protection Plan

Last Reviewed: March 2023

Students' Union approval: March 2023

Approved by Council: March 2023

Contents

| | |
|--|----|
| Information and document control | 2 |
| Introduction..... | 4 |
| Assessment of Risk | 5 |
| Measures to preserve Continuation of Study..... | 11 |
| Refunds and Compensation | 13 |
| Individual needs and welfare support..... | 13 |
| Communication and Review of this Student Protection Plan | 13 |

Introduction

Why do we have a Student Protection Plan?

1. All Higher Education Providers are required to have in force a student protection plan which has been approved by the Office for Students ('OfS').
2. This Student Protection Plan ('the Plan') is intended to provide assurance to our current and future students, as well as the OfS, that we (St. George's, University of London ('SGUL')) have in place the appropriate arrangements to protect the quality and continuation of study for our students.
3. As a normal part of our day-to-day operations, we continuously monitor our strategic risks (what could go wrong in SGUL's specific circumstances) and many of these relate to things that could affect the continuation of study for our students and so they have to be carefully considered. The impact of these range from the very extreme and highly unlikely scenario of SGUL being unable to continue to operate, to SGUL being unable to provide a particular component of a programme, which is more likely, but has less impact.
4. Our values are Collaboration, Ambition, Respect and Equity. We are, therefore, fully committed to ensuring that all of our students, regardless of background, thrive at SGUL and take the need to protect our students very seriously. After reading the Plan, you will understand:
 - the range of risks to the continuation of your studies, how these risks differ based on your individual needs, characteristics and circumstances, and the likelihood that these risks will crystallise;
 - the measures that we have put in place to mitigate the risks that are reasonably likely to crystallise;
 - information about the policy we have in place to refund tuition fees and other relevant costs in the event that we are unable to preserve continuation of study;
 - and how we communicate the student protection plan with students.

Who does the Plan apply to?

5. The Plan covers all students who are currently registered on a programme awarded by St George's, University of London (SGUL). This includes students at the University of Nicosia in Cyprus who are registered for the degrees of Bachelor of Medicine, Bachelor of Surgery (MBBS) under a franchise agreement with SGUL. It also includes students on our research degrees, including MD (Res) and MPhil/PhD some of which are offered as part of Doctoral Training Partnerships with other universities such as London School of Hygiene & Tropical Medicine
6. The Plan also gives assurance to future students about how we have assessed and mitigated, where required, any risks to continuation of study so they can join the SGUL community safe in the knowledge that we will ensure their continuity of study.

Assessment of Risk

7. Below is an assessment of the range of risks that we perceive to be particularly relevant to the continuation of study for our students, how these risks will differ based on the different needs of our student and an assessment of how likely we think the risks will crystallise:

A going-concern

8. When looking at the SGUL as a whole, we assess it to be **very unlikely** that SGUL will no longer be able to operate, decide to cease our activities, or that we would lose the power to award degrees. This scenario would have big impact and affect all students. We are the second oldest medical school in the United Kingdom and trace our heritage back to 1733. We are financially sustainable (see below) and ambitious for our future. We have recently published our new strategic vision which covers the period until 2030. This will enable us to continue our vision of improving health through inspiring education and focussed research.
9. We are one of five London universities with a medical course and whilst there is healthy competition between medical courses in London we are the only one (and indeed in the UK) that is solely dedicated to medicine, healthcare and science and we are unique in sharing our site with an acute Hospital, St George's University Hospitals NHS Foundation Trust. Our courses are in priority areas, there is strong demand for our courses amongst applicants and a need for our graduates. The integration of patients, healthcare workers, students and scientists creates a vibrant and dynamic environment that is unique and students are immersed in this from day one. Being in Tooting, London, we are both part of a global city and a thriving local community. We take pride in our location – in our links with the local community, including its schools; in the employment opportunities we bring; and in its diversity. We consider that our geographic location and our status is **very unlikely** to have a negative effect on our ability to operate successfully.
10. The risk of SGUL failing to ensure the financial sustainability needed for our students' continuation of study is **unlikely**. This is mitigated by our detailed annual budgeting process delivering surplus in line with the long-term financial plan as well as regular reporting and forecasting with academic and professional staff regularly meeting finance managers to review variances. We plan to deliver operational and cash surpluses over the medium to long term with sufficient liquidity to deliver day to day activities. Long term plans are sent to the Office for Students (OfS) and no challenge has been received. In addition, financial management and controls are overseen by council and subject to internal audit. Our externally audited financial statements going back to 2009 are available on our [website](#).
11. The Office for Students (OfS) is the government-approved regulatory and competition authority for the higher education sector in England from 1 April 2018. In April 2018,

the OfS visited SGUL to undertake an Assurance Visit and SGUL was given the statement of “we are able to place reliance on the accountability information” this is the highest level of assurance available as a result of the OfS’ visit. The OfS takes a risk-based approach to regulation and puts in place additional monitoring requirements for universities considered to be at higher risk. The OfS requires all providers to submit an Annual Financial Return each year to assess the financial sustainability, management and governance arrangements; SGUL is not subject to any additional monitoring by the OfS. This provides further evidence to suggest it is **very unlikely** that SGUL will fail due to poor management, governance or not being financially sustainable.

Business continuity

12. SGUL has a robust business continuity plan to respond to any incident which causes or may cause interruption to the normal operations of SGUL, and that could potentially affect the continuity of study. Such incidents could include involving (a) Building infrastructure (e.g. power, water); (b) Staff and Students (e.g. travel disruption, bad weather, pandemic); (c) Systems, networks, data or Information services; (d) Loss or inaccessibility of premises (including Halls of Residence); and NHS Trust Major Incidents that could have an impact on teaching. The recent pandemic has taught us that these scenarios are possible, however our processes have been tested and have proved effective. It is therefore **unlikely** that students will be significantly interrupted in their studies, though some disruption and delay is **possible**.

13. Key elements of our Business Continuity Plans include: (1) Emergency Response Plans (e.g. fire and evacuation plans); (2) Crisis Management Team Plans; (3) Institute and Departmental Recovery Plans; (4) Emergency Communications Procedures; (5) Media/PR Communications Strategies; (6) Information Services Recovery Plans; (7) Alternative Premises Strategies; (8) Integration with St George’s University Hospitals NHS Trust and National Blood Service; and (9) effective online delivery of teaching and services. Electronic communication with staff and students has proved effective in ensuring students know how we will be mitigating and preserving the continuity of their studies as far as possible in the meantime. We will be cognisant of the individual needs of students when making decisions about how best they can continue their studies. For example, some students may be unable to travel to Tooting (due to caring responsibilities, for example).

Degree-awarding powers

14. A constituent college of the University of London since 1836, SGUL has traditionally awarded University of London degrees. The Privy Council awarded SGUL taught and research degree awarding powers in its own right in 2009 and all students commencing studies from 1 September 2012 have been awarded SGUL degrees. There is no restriction or condition on our entitlement to award degrees and it is **very unlikely** that SGUL will lose its power to award degrees.

15. The University of London Act 2018 paved the way for St George's, University of London to have official University status which was awarded to St George's in March 2022 and came into effect on 30 June 2022. Note, this will not affect SGUL's ability to award degrees.

Academic Quality

16. We have a well-established process for developing, reviewing and approving the academic and business cases for new programme proposals to ensure that they are aligned to our strategy and that they are financially viable before we validate (a process which assures the quality and standards of new programmes) them. The validation process is outlined in the [Quality Manual](#). All validated programmes must be reviewed from time to time and Programmes will normally be reviewed at least once every five years (Periodic Review) to ensure that we continue to be assured of the high teaching quality and academic standards we expect of SGUL programmes.
17. The periodic review process considers all aspects of teaching quality and academic standards. It also confirms that programmes are supported by adequate physical and human resources. Details of current periodic reviews are available [here](#). It is **unlikely** that a programme will not be validated or pass its periodic review. If there are any issues with a programme or programmes, it will be picked up and dealt with as part of Annual Programme Monitoring (which is the year-on-year process by which the staff who have responsibility for the delivery of a programme evaluate the effectiveness of the programme in achieving its stated aims, and the success of students in attaining the programme's learning outcomes).
18. We have processes for registering research students that confirm the quality of their research programme, adequacy of the supervisory team, availability of specialist resources, access to doctoral training and monitoring of student progress.
19. One of our main strategic objectives is to continue to invest in a high-quality physical and virtual infrastructure and each year we have an estates capital programme to ensure this, if an issue emerges which will affect the delivery of teaching this is prioritised for investment and mitigated as necessary in the short term, for example, by seeking access to external facilities. Over the past few years, students will have seen new teaching spaces such as the Curve Lecture Theatre and improvements in renovating teaching space, lecture theatres, teaching facilities, the refurbished and expanded the postgraduate common room and other social space, such as the Students' Union. We, therefore, consider it **unlikely** that our estate will not be fit for purpose.

Professional, Statutory, and Regulatory Bodies

20. SGUL is a distinctive higher education provider in that we focus solely on healthcare sciences, the bio-sciences and medicine, with many of our programmes leading to professional registration. At the level of the professional programme, SGUL has two

main regulators: the General Medical Council (GMC) and the Health and Care Professionals Council (HCPC). The loss of accreditation from these, or other Professional, Statutory, and Regulatory Bodies would be a significant risk our students' continuation of study, however we assess the likelihood of losing our accreditation to be **unlikely**. We have well established quality assurance processes and the regulators regularly undertake their own quality assurance exercises via monitoring and visits. We are in good standing with our regulators.

21. The Office for Students (OfS) is the regulator for the Higher Education Sector. The OfS aims to ensure that every student, whatever their background, has a fulfilling experience of higher education that enriches their lives and careers. Their work covers all students whether undergraduate or postgraduate, national or international, young or mature, full-time or part-time, studying on a campus or by distance learning. SGUL is on the OfS Register of Providers in the 'approved (fee cap)' category and meets the on-going conditions of registration. We are very passionate about ensuring that our students and indeed our whole community thrives and this and our current [education and student experience section of our strategic vision](#), is very well aligned with the expectations of the OfS. We therefore think it is **very unlikely** that we will fail to meet all conditions of registration with the OfS.

Clinical Placements

22. Many of the degree programmes offered by SGUL rely on the provision of clinical placements so that our students can undertake their practical training. A loss of all student placements would have significant impact our students' continuation of study, however we assess the likelihood of this occurring to be **unlikely**. It is **possible**, however, that from time to time placement providers decide not to take students or change the placements available, by either increasing, decreasing or offering different specialities. It is also **possible** that occasionally NHS regulators may identify problems with the quality of clinical care or postgraduate training that would lead us to temporarily remove students from a clinical site pending remedial actions by the site.
23. The university works closely with its placement providers, we continually review provision and work to identify new opportunities. This provides assurance to SGUL that there is resilience in the placement system should one placement provider fail. Our student recruitment targets are carefully set with a view to the availability of placements. Most clinical placement providers receive payment for teaching students, so as well as supporting education, they are able to earn additional income. In some areas we are able to use our inhouse facilities to replicate placement experience and practise skills.

Our Programmes

24. Our core portfolio of undergraduate programmes is well-established, the first cohort of our newest undergraduate degree, BSc Clinical Pharmacology graduated in 2022.

Where we develop a new programme this is supported by market research and a business case to provide assurance regarding sustainability. It is **possible** from time to time it may be necessary to discontinue a programme. If that is the case, the needs of continuing students will be our overriding priority and we will look to “teach out” the current students.

25. We also offer a number of specialist postgraduate programmes. Periodically, we refresh our postgraduate portfolio to ensure that our programmes are relevant to providing outstanding education, up-to-date and attractive to potential students. Through this process, we occasionally withdraw a programme that is no longer viable. The shorter duration of our postgraduate programmes and small cohort sizes allows us to manage the programme closure process quickly and efficiently and without disruption to students. It is also **possible** that we will make changes to our postgraduate portfolio. For example, we are in the process of expanding our postgraduate education portfolio and developing new programmes, such as our new MSc Heart Failure programme which first recruited in January 2022.
26. It is also **possible** that within programmes, we may decide to make changes to the content or mode of delivery of programmes or modules to ensure our programmes remain up-to-date, attractive to students, aligned to the requirements of any relevant professional or statutory body and/ or the needs of the healthcare sector or industry. Any changes will be made in line with the requirements of the Competition and Markets Authority requirements. See below for how we would mitigate this to preserve continuation of study.
27. We do not have any programmes that are dependent on one individual, so it is **very unlikely** that a programme would cease due to not having appropriate members of staff. We benefit from a high quality and committed academic workforce who would be able to ensure all programmes are covered. Specialist expertise exists across our extensive healthcare networks.
28. Postgraduate research students are supervised by a team of supervisors rather than an individual supervisor. This has many benefits, but, in particular, helps to mitigate the risk of a supervisor not being able to continue for example due to illness or leaving the university. It is therefore **unlikely** that a student will lose their supervisor.

Industrial Action

29. The university may occasionally be affected by industrial action. In recent years strikes which have affected other institutions have not badly affected St George's due to the variety of unions which staff are members of. It is **possible** that teaching will be affected by strike action in the university or the NHS. During any period of industrial action the university will monitor teaching affected and take mitigating action.

Student recruitment

30. It is **unlikely** that we will be unable to recruit enough undergraduate students to our programmes to make them feasible. Our programmes are popular and prepare students for important roles with excellent employment and career prospects. Our programmes have also proved popular in clearing and adjustment and high-quality students are able to be recruited.
31. It is **possible** that some postgraduate programmes will not recruit enough students. Where this is repeatedly the case, and as we look at developing and expanding our postgraduate provision, we may decide to discontinue a particular programme or modify a particular element of the programme. See below for how we would mitigate this to preserve continuation of study.
32. St George's has held a Student Sponsor licence (previously a Tier 4 licence) since the 23rd February 2009, this licence is not due to be renewed until March 2025. St George's has applied for and successfully passed the annual Basic Compliance Assessment (BCA) each year since. On this basis, it is **unlikely** that St George's will lose its licence.
33. Compliance activities take place at all stages of the student lifecycle: admissions (immigration history checks, time limit on study, academic progression etc.); at registration (enrolment, record keeping etc.); during study for the tracking of students (attendance, work placements etc.); and for student reporting (withdrawals, IOS, changes in circumstances).

SGUL MBBS awarded by the University of Nicosia, Cyprus

34. We have a collaboration with the University of Nicosia (UNic) that allows UNic to deliver our MBBS programme under a franchise agreement. SGUL has decided to withdraw from the partnership. The collaboration is underpinned by a long term legally-binding agreement which requires both parties to work constructively to ensure that all students are supported fully until they have completed the programme.
35. We are permitted by the General Medical Council to award UK primary medical qualifications (PMQs). This means that all SGUL MBBS graduates including those that complete the MBBS under the franchise agreement with UNic are eligible to apply for provisional registration with the GMC. As a consequence, the franchise agreement has been subject in full to all GMC quality assurance processes. In the **very unlikely** event that we were to lose our entitlement from the GMC to award PMQs, we would agree an appropriate teach-out strategy with the GMC for all students including those students registered under the franchise agreement. Specifically, we would support the University of Nicosia in finding an alternative franchise partner or arrange for students to continue their studies at a different provider. In all cases, we would take into account the individual needs of each student. For example, a student's nationality may have an impact on where they study.

36. Under the Franchise Agreement, UNic is required to let us know in good time if any issues arise which may prevent the UNic from delivering the MBBS to the high standard we expect. These issues might include matters related to its financial sustainability and its standing with the relevant governmental and regulatory authorities in Cyprus. It is **very unlikely** that issues of this kind will occur. If that were the case, we would put in place a framework to enable students to complete the programme in Cyprus or elsewhere. UNic is in good financial health and in good standing with its national regulators.

Measures to preserve Continuation of Study

37. This section of the Student Protection Plan explains the measures we have put in place to mitigate the risks that we consider reasonably likely to crystallise – these are the risks categorised as **possible**. This is intended to give you, as students, assurance that we have considered carefully how we will ensure your continuation of study is preserved:

Placement Providers

38. We benefit from several hundred placement agreements across our programmes with many providers including over 20 NHS Trusts and over 100 GP practices in London and the South of England. We have a varied pool of placement providers, (such as a range of different types of NHS Trusts and independent placement providers such as GP surgeries and care homes). We work closely with providers to maintain these agreements. This greatly **reduces the impact** in the scenario of losing one placement provider and significantly **reduces the likelihood** of all placements being lost as there are many providers to call on. It provides a pool of alternative providers to contact should we be in the position of needing additional clinical placements.

Our Programmes and student recruitment

39. We are dedicated to ensuring that all of our students, regardless of background, thrive at SGUL. Should we take the decision to close a programme, for whatever reason, our first priority are the students. We will ensure that we ‘teach out’ (ensure that students complete the programme that they are on) students that are currently registered on that programme. Where this is not possible or preferable (in the unlikely event a programme has to be closed for reasons of poor quality) we will support our students to find an alternative institution at which they can continue to thrive. We have explained how this might work below, giving a recent example.

40. We have a procedure for closure of programmes with authority to discontinue a programme resting with the Vice Chancellor, who will take advice from Senate and/ or our Executive Board as appropriate. Applications to discontinue a programme may be initiated by the Institute Director offering the programme. In all cases the formal

Programme Closure Form will be used and reference will be made to our [Quality Manual](#) on good practice in programme closure.

41. We manage the closure of a programme by means of a comprehensive teach out plan which covers the teach out phase of the course and ensures that all students are able to achieve the qualification for which they registered. The plan is our guarantee to students that all resources will remain in place to ensure that they receive a high quality experience through to graduation. The plan will ensure that students whose progress may be delayed, for example due to temporary ill health or other mitigating factors, are nonetheless able to complete their study.
42. We recognise that each student has different requirements. Where we have closed a programme in the past, we have worked closely and met regularly with the students affected to ensure their individual needs are met for their specific circumstances.
43. Should we no longer be able to continue to provide a programme and teach out the current students, we would offer the affected students alternative available programmes from our portfolio (for which they meet the entry criteria), recognising that these alternative programmes may not be appropriate for all students, for example if they wish only to study a particular programme. In the instance where the alternative proposed study at SGUL is not reasonably appropriate for the student, we will support and assist them in transferring to an alternative institution at which to continue their studies (though they would have to meet the entry criteria). Where there are commissioned programmes (such as our Paramedic Programme available to the South East Coast Ambulance Service) or programmes that are capped (such as MBBS), we would have to liaise with the relevant commissioning group (such as Healthcare Education England) and the relevant regulator (such as the GMC) to ensure appropriate permissions are sought to facilitate transfer to alternative providers. Indeed, the regulatory element would be advantageous as regulated programmes will have the same outcomes. We would ensure that we bear the Competition and Markets Authority and Consumer Protection Law in mind when implementing any scenario. These measures will **reduce the impact** of closure of programmes on the student's continuity of study.
44. When we make changes to programmes we do so in line with Consumer Protection Law and ensure that students receive sufficient and appropriate notice of any changes and that changes and the rationale will be explained carefully to the students. It is likely that any change will be for positive enhancement reasons. This will greatly **reduce the impact** of the change on students.
45. We recognise that different students have different requirements and we commit to tailor our measures and support wherever reasonable, in order to ensure continuation of study. For example, where a student may have mitigating circumstances that limit their ability to attend an alternative HE provider or alternative placement site (such as parental or caring responsibilities), the usual processes for placement allocation would be followed so that these students are prioritised. In making any changes, we will take into account individual needs of students, which might be protected characteristics (such as reasonable adjustments for students with disabilities).

46. Where we are unable to preserve a students' continuation of study, we would enact our Tuition Fee Policy and Refund and Compensation Policy which are in place to make clear guidance around refund of tuition fees and other relevant costs to students and provide compensation where appropriate. This will **reduce the financial impact** for the student. See below for further details.

Refunds and Compensation

47. We have a [Refund and Compensation Policy](#) and [Tuition Fee Policy](#), which outline the circumstances in which refunds and compensation will be considered in the unlikely event that we are unable to preserve continuation of your study.

48. If you are reading this as an applicant, the Refund and Compensation Policy also outlines how we will support you should we have to terminate a programme on which applicants have been offered and have accepted a place.

49. Our financial statement sets out our financial reserves. In our assessment this demonstrates that SGUL has adequate cash reserves to deliver the financial implications of our Refund and Compensation Policy, should we need to deliver on this.

Individual needs and welfare support

50. At SGUL, we pride ourselves on our student support services, which serve our wonderfully diverse student body. We are proud to attract and inspire students nationally and internationally who will thrive on our programmes, regardless of background, or protected characteristics such as disability, race, religion or belief, or sexual orientation. In the event of our Student Protection Plan being enacted, we will explicitly take into account the possible different needs of different students, such as those with protected characteristics and those from different backgrounds.

51. All students are given access to all of our support services and if there is any risk to continuation of study, students will be reminded and 'signposted' to relevant student services, including our Counselling Service, and to services offered by the Students' Union. We will also ensure that all affected student's Personal Tutors are fully briefed too so that bespoke, tailored, support can be provided to each and every student. This will also be emphasised through appropriate methods of communication as outlined below. Full details of our services can be found on our website [here](#). Students can also approach the Student Life Centre for support and referral to services.

Communication and Review of this Student Protection Plan

52. This Student Protection Plan is published on the SGUL [website](#) and as such is available to current and future students, staff and members of the public. We will also

include the Plan with the material we provide to applicants when we make offers to study on a programme. It is also provided upon enrolment and induction for new students. Current students will be made aware of the Plan at the start of each academic year.

53. The Plan is a live document and will be routinely reviewed on an annual basis, prior to the start of each academic year, through our established governance process which already includes involvement from students. The Students' Union will be consulted as part of this outside of the governance process. Following each review, the revised plan will be submitted for approval by Council, within which there is student representation, providing further opportunity for student input and confirming approval. This current plan has been approved by Council, and independently by our Students' Union President.
54. Should measures in the plan need to be triggered, this would be communicated to the affected students within 10 working days of the decision to trigger the plan being made.
55. The communications would be in a variety of forms (e.g. town hall meetings, emails and one-to-one meetings to discuss individual needs) and points of contact established in order to ensure that all students could engage with the process and receive information, advice and guidance. Additionally, all students have access to, and are members of, St. George's Students Union, which is a wholly independent registered charity who can provide independent advice to our students.
56. Should a student wish to make a complaint about our implementation of this Student Protection Plan, they should follow our student complaints procedure, as set out on our [website](#).
57. We will also ensure the Plan is shared with staff and Personal Tutors will be briefed specifically as they will be best placed to support each student individually. This will be available on the policy section of the website and will be cross-referenced to as appropriate from other policies. We will ensure that the Plan is brought to the attention of relevant colleagues as part of the induction process. The Plan will be publicised to staff via 'George's Weekly' our internal staff newsletter.